



LAW OFFICE OF

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MEMO ENCLOSED  
June 26, 2023**VIA ECF**

Honorable Kenneth M. Karas  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 300 Quarropas Street  
 White Plains, New York 10601

Re: *Jackson Gamboa v. Regeneron Pharmaceuticals, Inc.*  
Docket No.: 22-cv-10605 (KMK)

Dear Judge Karas:

This firm represents Plaintiffs Jackson Gamboa and Pedro Rocha (collectively as "Plaintiffs"), who brought the above-referenced matter against Defendant Regeneron Pharmaceuticals, Inc. for violations of the New York Labor Law. Defendant filed a motion to dismiss the Complaint. D.E. 25-27. Plaintiffs' opposition to Defendant's motion to dismiss is currently due on June 28, 2023 and Defendant's reply papers are due on July 5, 2023. Plaintiffs write to request a two-week extension of time to submit their opposition papers. Plaintiffs seek this extension due to counsel's unusually active litigation schedule, including being engaged in opposing multiple dispositive motions and other substantive motion practice during the same time period. Beyond this, Plaintiffs seek this extension because certain unanticipated, urgent and time-consuming tasks arose in other matters during the time allotted by the undersigned to prepare Plaintiffs' opposition. As a result, Plaintiffs request, with Defendant's consent, a two-week extension of time to submit their opposition to Defendant's motion from June 28, 2023 to July 12, 2023, and also request a commensurate extension of time for Defendant to submit its reply papers from July 5, 2023 to July 19, 2023. Plaintiffs sought one prior request for the relief sought herein, which was granted.

We thank the Court for its kind consideration of this request.

Granted.

So Ordered.  
  
 6/23/23

Respectfully submitted,

DAVID D. BARNHORN, ESQ.

C: All Counsel of Record *via ECF*